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*Counsel to Argonaut Insurance Company*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	
	:	
	:	Chapter 11
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	
	:	
Debtors. <sup>1</sup>	:	Case No. 18-23538 (RDD)
	:	
	:	(Jointly Administered)

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**NOTICE OF APPEARANCE AND  
REQUEST FOR NOTICE AND PAPERS**

**PLEASE TAKE NOTICE** that Cadwalader, Wickersham & Taft LLP hereby  
enters its appearance as counsel for Argonaut Insurance Company (“Argonaut”), pursuant to

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

section 1109 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and such counsel hereby requests that all papers served or required to be served in this case and in any cases consolidated or administered herewith, be given and served upon:

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This request encompasses all notices, copies, and pleadings referred to in section 1109(b) of the Bankruptcy Code, or in Bankruptcy Rules 2002, 3017, or 9007 including, without limitation, notices of any orders, motions, orders to show cause, demands, complaints, petitions, pleadings, memoranda, affidavits, declarations, notices of adjournment, disclosure statement(s) and plan(s) of reorganization, or requests, presentments, applications, and any other documents brought before this Court or in this case and the proceedings herein, whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, electronic mail, telegraph, telecopy, telex, facsimile or otherwise which affect or seek to affect the above captioned case and any proceedings therein or the property of or in the possession, custody or control of any of the Debtors or which is otherwise filed or given with regard to the above-captioned case.

Neither this Notice of Appearance and Request for Notice and Papers nor any subsequent appearance, pleading, claim, proof of claim, document, suit, motion nor any other writing or conduct should be taken to constitute a waiver of any right of Argonaut: (i) to have

any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding whether or not such matters are designated as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial is pursuant to statute or the United States Constitution; (iii) to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and (iv) to rights, claims, actions or defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements or at law or in equity or under the United States Constitution.

Dated: December 18, 2018  
New York, New York

/s/ Eric G. Waxman III

Eric G. Waxman III

Anthony De Leo

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